

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Thomas Peters) Case No.
14159 Revere Circle)
Middleburgh Hts., OH 44131) Judge:
)
Plaintiff,) COMPLAINT
)
-vs-) JURY TRIAL DEMAND ENDORSED
) HEREON
The Federal Reserve Bank of Cleveland)
1455 East Sixth Street)
Cleveland, OH 44114)
)
Defendant.)
)

1. This is an action under Title VII of the Civil Rights Act of 1964, (Title VII), as amended, and the Civil Rights Act of 1991 for injunctive and declaratory relief and money damages for Defendant's violation of Plaintiff's rights.

PARTIES

2. Plaintiff resides in Cuyahoga County, Ohio and was at all relevant times employed by Defendant.

3. Defendant is a federal instrumentality that operates in the Northern District of Ohio. Defendant employed Plaintiff in Cuyahoga County, Ohio.

JURISDICTION AND VENUE

4. This action is instituted and authorized by said statutes.

5. Jurisdiction of this Court to hear and determine these claims is based on 28 U.S.C. § 1331 and 28 U.S.C. § 1343.

6. A declaratory judgment is sought pursuant to 28 U.S.C. §§ 2201 and § 2202.

7. Venue is proper in this Court as all the acts complained of herein occurred in the Northern District of Ohio.

FACTS

8. The Plaintiff resides in Middleburgh Heights, Ohio. He is a white male. At all times relevant and since July 2018 he has worked for the Defendant as a permanent employee as a law enforcement officer.

9. In or about March 2022 Plaintiff applied for a promotion to Operations Supervisor. Defendant considered Plaintiff's application but denied him the opportunity to interview for the position and awarded it to a less qualified black male.

10. In or about May 2022 Plaintiff applied for a second Operations Supervisor position. Defendant considered Plaintiff's application but again denied Plaintiff the opportunity to interview for that position and awarded it to a less qualified non-white male.

11. Plaintiff was fully qualified for the Operations Supervisor position and met all of the objective qualifications for that position.

12. Plaintiff contends the Defendant's actions were based on his race in order to promote minority candidates despite Plaintiff being more qualified than the minority candidates who were interviewed and promoted.

13. Plaintiff timely filed a charge of discrimination with the Equal Employment Opportunity Commission (EEOC) on or about December 6, 2022, EEOC Charge No. 532-2022-02479 alleging discrimination based on his race. A copy of his charge marked as Exhibit A, is attached hereto.

14. The EEOC issued a Notice of Right to Sue to Plaintiff on May 3, 2024 giving him ninety (90) days to file suit. A copy of the notice is attached as Exhibit B.

DEMAND FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Declare the policies and practices of the Defendant, as described herein to be unlawful and in violation of federal law;
- B. Grant Plaintiff a permanent injunction, prohibiting Defendant from engaging in any policy or practice which discriminate on the basis of race;
- C. Order Defendant to make Plaintiff whole, by promoting the Plaintiff with appropriate back pay, front pay and benefits, in amounts to be determined at trial as well as his seniority;
- D. Award economic damages including back pay and front pay as well as compensatory and emotional distress damages in amounts to be proven at trial;
- E. Award Plaintiff pre-judgment and post judgment interest on all sums awarded;
- F. Award Plaintiff the costs of this action, including costs and reasonable attorneys' fees; and
- G. Grant such other legal and equitable relief to which he is entitled as is necessary and proper, including reasonable attorney fees.

JURY TRIAL DEMANDED

Plaintiff requests a jury trial on all questions of fact raised by his Complaint.

Respectfully submitted,

/s/ Alan I. Goodman

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